



703 Hamilton Parkway
Syracuse New York 13214
315.392.0060
csimon@extensionet.com

June 19, 2019

Via ECFS

Ms. Marlene Dortch
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Notice of Ex Parte, PS Docket No. 07-114 and PS Docket No. 18-261

Dear Ms. Dortch,

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter provides notice that Charles H. Simon, Jr., CEO and Founder, Precision Broadband LLC ("Precision Broadband"), met by phone separately with Travis Litman, Chief of Staff and Senior Legal Advisor for Commissioner Jessica Rosenworcel and Randy Clarke, Acting Legal Advisor for Wireline and Public Safety for Commissioner Geoffrey Starks.

During these calls, we discussed the points made in our filed comments and reply comments to PS Docket No. 07-114.¹ We shared our disagreement with the reply comments offered by AT&T which stated, "that imposition of a floor level data requirement is infeasible at this time."² Precision Broadband has a solution, including a working prototype, that offers floor level and unit location data – same as landline telephone service. We contend that the wireless carriers' test beds have been designed to validate the NEAD (for dispatchable location) and device sensor-based z-axis altitude technologies.³ Such limited test plans, by design, exclude alternative dispatchable solutions like Precision Broadband's Fixed Broadband 911 system.

We continued to make our case for the importance of facilities-based ISPs with 911 location services, although the NEAD is not the correct vehicle for the ISPs to participate. We shared that in addition to providing a more complete solution for dispatchable location, the system proposed by Precision Broadband would allow the ISPs to maintain the necessary privacy of their customers' data – a concern raised by the ISPs regarding the NEAD. We also emphasized that the Precision Broadband prototype could be developed into a production system to provide accurate dispatchable locations by 2021 without construction of new infrastructure or other costly investments.

¹ Comments of Precision Broadband LLC, PS Docket No. 07-114 (filed May 20, 2019), *available at* <https://ecfsapi.fcc.gov/file/1052037980575/Precision%20Broadband%20Comments-PS%2007-114%202019-5-20%20.pdf>

Reply Comments of Precision Broadband LLC, PS Docket No. 07-114 (filed June 7, 2019), *available at* <https://ecfsapi.fcc.gov/file/10607227049000/Precision%20Broadband%20Reply%20Comments-PS%2007-114%202019-6-7-Final%20.pdf>

² Reply Comments of AT&T Services, Inc., PS Docket No. 07-114 (filed June 19, 2019), *available at* <https://ecfsapi.fcc.gov/file/1061890011532/Reply%20Comments%206.18.19.pdf>

³ 9-1-1 Location Technologies Test Bed LLC, *available at* http://www.911locationtestbed.org/Stage_z.html

Lastly, we discussed the challenge of instituting a new proceeding for expanding the sources of location information as Precision Broadband recommended in its Reply Comments. Precision Broadband only recommends such a new proceeding if the current proceedings (PS 07-114 and PS 18-261) could not be expanded to accommodate other sources of location information as we described in our comments.

If you have questions or need additional information, please contact me anytime.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charles H. Simon, Jr.", with a stylized flourish at the end.

Charles H. Simon, Jr.

cc: (via email)
Travis Litman
Randy Clarke